

1 The Honorable Timothy W. Dore  
2 Chapter 13  
3 Hearing Date: July 16, 2025  
4 Hearing Time: 9:30 AM  
5 Location: United States Bankruptcy Court  
6 Courtroom 8106  
7 700 Stewart Street. 8<sup>th</sup> Floor  
8 Seattle, WA 98101  
9 Response date: July 16, 2025 order shortening time

10 UNITED STATES BANKRUPTCY COURT  
11 FOR DISTRICT COURT FOR THE  
12 WESTERN DISTRICT OF WASHINGTON  
13 AT SEATTLE

14 In re:

15 MELISSA HUELSMAN,

16 Debtor,

Case No.: 25-11306-TWD

CHAPTER 13

INTERESTED PARTY POMAIKAI,  
LLC'S RESPONSE OPPOSING  
ASSIGNMENT OF REDEMPTION AND  
SALE OF PROPERTY

18 Comes now Pomaikai, LLC, through its attorneys Seth Goodstein and ROI Law Firm,  
19 PLLC. Pomaikai is the purchaser of the property located at 7525 28th Ave SW, Seattle, WA  
20 98126 ("Premises") at a duly conducted, confirmed, sheriff's sale, respectfully submits this  
21 response in opposition to the Debtor's pending Motion to Approve Sale of Real Property and  
22 Motion to Approve Assignment of Redemption Rights.  
23

24 POMAIKAI, LLC RESPONSE RE STAY AND  
25 ASSIGNMENT - 1

**ROI LAW FIRM pllc**  
1302 North I Street, Ste. C  
Tacoma, WA 98403  
Tel: (253) 753-1530  
Fax: (253) 753-1532

1 Both motions to assign and sell are moot because the statutory redemption period—as  
2 extended under 11 U.S.C. § 108(b)—expired on July 14, 2025, without redemption having  
3 occurred. This fully vested Pomaikai, LLC with non-defeasible title to the property and  
4 mandates immediate issuance of the sheriff's deed to Pomaikai, LLC. Since redemption is  
5 strictly and uniformly enforced, there is no need to inquire further.

6 On July 11, the Debtor and Pomaikai entered into and filed a stipulated order so that  
7 Pomaikai, LLC can finalize the sale on or after July 15, 2025. This order reflects the legal  
8 finality of redemption and the sale to Pomaikai.  
9

10 To the extent the Court is holding the hearing to see if Pomaikai, LLC would like to  
11 authorize the assignment and sale by agreement Pomaikai respectfully declines.

## 12 **II. BACKGROUND FACTS**

### 13 **1. Foreclosure and Sale**

14 A Judgment and Decree of Foreclosure was entered against the Premises in King County  
15 Superior Court Case No. 23-2-00469-8 SEA. A sheriff's sale was held on April 5, 2024, at which  
16 Pomaikai, LLC was the successful bidder. The Court entered a confirmation of sale and  
17 disbursement order on June 18, 2024.

### 18 **2. Redemption Period and Extensions**

19 All Parties agree that Debtor filed this Chapter 13 on May 14, 2025, the last day of  
20 redemption, triggering the further 60-day extension under 11 U.S.C. § 108(b). Thus, the final  
21 redemption deadline became Monday, July 14, 2025.  
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#### 4. Legal Finality of Sale

## 5. Relief from Stay Filed and Resolved by Agreement

### III. LEGAL ARGUMENT

POMAIKAI, LLC RESPONSE RE STAY AND  
ASSIGNMENT - 3

**ROI LAW FIRM PLLC**  
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1 *Sharp*, 666 B.R. at 917–18 (B.A.P. 2025). “Shall” denotes a mandatory outcome. Courts lack  
2 discretion in this context: “At best, such debtors may extend the time to redeem their property for  
3 60 days under § 108(b).” *In re Sharp*, 666 B.R. at 922. *Sharp* “agree[d] with [In re Richter, 525  
4 B.R. 735, 749 (Bankr. C.D. Cal. 2015)] and adopt[ed] its reasoning to dispose of the instant  
5 appeal”. *Richter* holds that redemption (and, logically, assignment of redemption rights) must be  
6 completed within the strict time limits set by statute. 666 B.R. at 917.

#### 7 8 **IV. CONCLUSION**

9 Because the redemption period expired without actual or legally effective redemption,  
10 Debtor’s motions are moot and should be denied. The court should:

- 11 1. Deny the Motion to Approve Sale of Real Property;  
12 2. Deny the Motion to Approve Assignment of Redemption Rights;  
13 3. Sign the Agreed order on relief from stay.

14 DATED this 25th day of June, 2025.

#### 15 **ROI LAW FIRM, PLLC**

16 By: /s/ Seth Goodstein  
17 Seth Goodstein, WSBA # 45091  
18 ROI Law Firm, PLLC  
19 1302 North I Street  
20 Tacoma, WA 98403  
21 Telephone: 253-753-1530  
22 Fax: 253-753-1532  
23 *Attorneys for Pomaikai, LLC*

1 **Certificate of Service**

2 I served the foregoing Response, Proposed Order Denying Assignment and Proposed Order  
3 Denying Sale on the following individuals by electronic means through the Court's ECF  
4 program, the mailing matrix is attached:

5 Trustee:  
6 Jason Wilson-Aguilar  
7 US Trustee  
8 Debtor  
9 ECF Participants

10 And by US Mail, postage prepaid to:  
11 Melissa Huelsman  
12 7525 28TH AVE SW, SEATTLE, WA 98126

13 All additional Mailing Matrix opt-out parties, if any.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 DATED this 15th day of July, 2025 at Tacoma, Washington.

16 **ROI LAW FIRM, PLLC**

17 /s/ Seth Goodstein  
18 Seth Goodstein

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25 POMAIIKAI, LLC RESPONSE RE STAY AND  
ASSIGNMENT - 5

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Label Matrix for local noticing  
0981-2  
Case 25-11306-TWD  
Western District of Washington  
Seattle  
Tue Jul 15 16:14:18 PDT 2025

CITICARDS CBNA  
PO BOX 6190  
SIOUX FALLS, SD 57117-6190

Seth Goodstein  
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1302 North I Street, Ste. C  
Tacoma, WA 98403-2143

JPMorgan Chase Bank, N.A.  
s/b/m/t Chase Bank USA, N.A.  
c/o National Bankruptcy Services, LLC  
P.O. Box 9013  
Addison, Texas 75001-9013

MACYS/CITIBANK NA  
PO BOX 8218  
MASON, OH 45040-8218

THD/CBNA  
PO BOX 6497  
SIOUX FALLS, SD 57117-6497

Verizon  
by AIS InfoSource LP as agent  
PO Box 4457  
Houston, TX 77210-4457

BANK OF AMERICA  
PO BOX 982238  
EL PASO, TX 79998-2238

Citibank N.A.  
Citibank, N.A.  
5800 S Corporate Pl  
Sioux Falls, SD 57108-5027

Melissa Huelmsman  
7525 28th Ave SW  
Seattle, WA 98126-3314

King County Sheriff  
516 3rd Ave W - 116  
Seattle, WA 98119

Pomaikai LLC  
3004 199TH AVE CT E  
Lake Tapps, WA 98391-9024

(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

(p)JASON WILSON AGUILAR  
600 UNIVERSITY ST STE 1300  
SEATTLE WA 98101-4102

CAPITAL ONE BANK USA  
PO BOX 31293  
SALT LAKE CITY, UT 84131-0293

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US Attorney's Office - WDWA  
700 Stewart St, Ste 5220  
Seattle, WA 98101-4438

Internal Revenue Service  
central insolvency operations  
PO Box 7346  
Philadelphia, PA 19101-7346

Erin Lane  
Washington Law Group  
16000 Christensen Rd  
Suite 304  
Tukwila, WA 98188-2967

Pomaikai LLC  
3004 199th Ave Ct E  
Bonney Lake, WA 98391-9024

United States Trustee  
700 Stewart St Ste 5103  
Seattle, WA 98101-4438

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

U.S. BANK  
4325 17TH AVE S  
FARGO, ND 58125

(d)U.S. Bank National Association  
Bankruptcy Department  
PO Box 108  
Saint Louis MO 63166-0108

Jason Wilson-Aguilar  
600 University St #1300  
Seattle, WA 98101

(d)Jason Wilson-Aguilar  
600 University St #1300  
Seattle, WA 98101

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Forrest Moody

(u)United States of America

End of Label Matrix	
Mailable recipients	19
Bypassed recipients	2
Total	21